

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

No. 7:20-CR-00020-BO-2

UNITED STATES OF AMERICA)
v.) CONSENT MOTION TO CONTINUE
) APRIL 2ND NEW DETENTION HEARING
JONATHAN REVELS,)
Defendant)

The defendant, Jonathan Revels, by and through counsel, hereby respectfully moves the Court to grant a continuance of the detention hearing from April 2, 2020. In support of this Motion, Mr. Revels states the following:

1. Attorney Bellonora McCallum, with the McCallum Law Firm was appointed to represent Mr. Revels on March 6, 2020. Counsel entered Notice of Appearance on March 6, 2020.
2. Undersigned Counsel just received additional information about potential 3rd party custodian and needs additional time to assist client with confirming an alternate 3rd party.
3. As such, undersigned Counsel respectfully requests that the detention hearing be continued accordingly to a later term of court.
4. Assistant United States Attorney Chad Rhoades was contacted prior to filing the motion and does not take a position on the motion to continue.
5. This motion is made in good faith and not for purposes of delay under 18 U.S.C. §3142(f).

WHEREFORE, the Defendant respectfully requests that the detention hearing be continued to a later term of court. A proposed order is submitted herewith.

Respectfully requested this 1st day of April, 2020.

/s/ Bellonora F. McCallum
BELLONORA F. MCCALLUM
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Criminal CJA –Appointed Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

Chad Rhoades
Assistant United States Attorney
United States Attorney's Office - EDNC
150 Fayetteville Street, Suite 2100
Raleigh, North Carolina 27601

by electronically filing the foregoing with the Clerk of Court on April 1, 2020, using the CM/ECF system which will send notification of such filing to the above.

This the 1st day of April, 2020.

/s/ Bellonora F. McCallum
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